

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CRYSTAL MCKINNEY,

Plaintiff,

-against-

SEAN COMBS a/k/a “P. DIDDY,” BAD BOY
ENTERTAINMENT LLC d/b/a BAD BOY
RECORDS, BAD BOY ENTERTAINMENT
HOLDINGS, INC., SEAN JOHN CLOTHING
LLC, and DADDY’S HOUSE RECORDINGS,
INC.,

Defendants.

No. 24-cv-03931

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, Declaration of Erica A. Wolff, dated November 8, 2024, the exhibits annexed thereto, the Declaration of Samantha Luevanos, dated November 8, 2024, the exhibits annexed thereto, and upon all prior proceedings had in herein Defendants Sean Combs, Bad Boy Entertainment LLC (named incorrectly as Bad Boy Entertainment LLC d/b/a Bad Boy Records), Bad Boy Entertainment Holdings, Inc., Sean John Clothing LLC, and Daddy’s House Recordings, Inc. (collectively, the “Combs Defendants”), will move this Court, in accordance with Fed. R. Civ. P. 12(b)(6), before the Honorable Naomi Reice Buchwald at the Thurgood Marshall United States Courthouse, Courtroom 21A, 500 Pearl St., New York, New York 10007, for an order dismissing Plaintiff’s Amended Complaint with prejudice (ECF No. 19).

Pursuant to Plaintiff and the Combs Defendants’ briefing schedule, answering declarations and memorandum of law, if any, shall be filed on or before Friday, December 6, 2024, and any reply declarations and memorandum of law shall be filed on or before Tuesday, January 7, 2025, unless otherwise extended by the Court. (ECF No. 30).

Dated: New York, New York
November 8, 2024

SHER TREMONTE LLP

/s/ Erica A. Wolff

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